

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
GE HFS HOLDINGS, INC.,)	
<i>formerly known as</i>)	
)	
HELLER HEALTHCARE FINANCE, INC.,)	
)	
Plaintiff,)	
and)	
)	
MICHAEL INGOLDSBY,)	
)	Civil Action No. 05-CV-11128 NG
Intervenor Plaintiff,)	
v.)	
)	
NATIONAL UNION FIRE INSURANCE)	
COMPANY OF PITTSBURGH, PA. and)	
INTERNATIONAL INSURANCE GROUP, LTD.)	
)	
Defendants.)	
_____)	

JOINT STATEMENT

Plaintiff GE HFS Holdings, Inc., formerly known as Heller Healthcare Finance, Inc., intervenor-plaintiff Michael Ingoldsby, defendant National Union Fire Insurance Company of Pittsburgh, PA., and intervenor-defendant International Insurance Group, Ltd. hereby submit this joint statement for the status conference scheduled for May 2, 2006.

I. Status of Matter

The parties are presently conducting fact discovery. A mediation between all parties is scheduled for May 4, 2006 before Magistrate Judge Joyce London Alexander.

II. Proposed Joint Schedule

EVENT	DATE
Completion of Fact Discovery	September 29, 2006
Expert Reports	October 30, 2006
Rebuttal Expert Reports	November 20, 2006
Complete Expert Depositions	December 15, 2006
Motions for Summary Judgment Filed Not Later Than	January 31, 2007
Oppositions to Summary Judgment Filed Not Later Than	March 1, 2007
Final Pre-Trial Conference	To be scheduled at Court's Convenience

III. Trial by Magistrate

The parties are not willing to consent to a trial by magistrate judge.

Respectfully submitted,

GE HFS HOLDINGS, INC.,
formerly known as
 HELLER HEALTHCARE
 FINANCE, INC.,

By its attorneys,

/s/ Jeffrey E. Francis
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Respectfully submitted,

NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA.

By its attorneys,

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Respectfully submitted,

MICHAEL INGOLDSBY,

By his attorney,

/s/ Gregory J. Aceto
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Dated: April 26, 2006

Respectfully submitted,

INTERNATIONAL INSURANCE GROUP
LTD

By its attorney,

/s/ Richard E. Heifetz
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Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 26, 2006.

/s/ Jeffrey E. Francis